

Guy Ruttenberg, Bar No. 207937
guy@ruttenbergiplaw.com
Steve A. Papazian, Bar No. 288097
steve@ruttenbergiplaw.com
RUTTENBERG IP LAW,
A PROFESSIONAL CORPORATION
1801 Century Park East, Suite 1920
Los Angeles, CA 90067
Telephone: (310) 627-2270
Facsimile: (310) 627-2260

Attorneys for Plaintiff Cadence Design Systems, Inc.

(Counsel for Defendants listed on following page)

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CADENCE DESIGN SYSTEMS, INC., a
Delaware Corporation,

Plaintiff,

vs.

SYNTRONIC AB, a *Publkt Aktiebolag*,
SYNTRONIC RESEARCH AND
DEVELOPMENT USA INC., a *California*
Corporation, SYNTRONIC (BEIJING)
TECHNOLOGY R&D CENTER CO., LTD.,
a Chinese Corporation,

Defendants.

Case No. 3:21-cv-03610-SI (JCS)

**JOINT NOTICE AND STIPULATION OF
VOLUNTARY DISMISSAL**

District Judge: Hon. Susan Illston

1 Edward P. Sangster, SBN: 121041
2 edward.sangster@klgates.com
3 Jason N. Haycock, SBN: 278983
4 jason.haycock@klgates.com
5 K&L GATES LLP
6 Four Embarcadero Center, Suite 1200
7 San Francisco, CA 94111
8 Telephone: +1 415 882 8200
9 Facsimile: +1 415 882 8220

10 Jeffrey C. Johnson
11 jeff.johnson@klgates.com
12 K&L GATES LLP
13 925 Fourth Avenue, Suite 2900
14 Seattle, WA 98104
15 Telephone: + 1 206 623 7580
16 Facsimile: + 1 206 623 7022

17 *Attorneys for Defendants Syntronic AB and Syntronic Research and Development USA Inc.*

18 Chao "Wendy" Wang, Bar No. 289325
19 WWang@perkinscoie.com
20 PERKINS COIE LLP
21 3150 Porter Drive
22 Palo Alto, California 94304-1212
23 Telephone: +1.650.838.4300
24 Facsimile: +1.650.838.4350

25 Matthew C. Bernstein, Bar No. 199240
26 MBernstein@perkinscoie.com
27 Miguel J. Bombach, Bar No. 274287
28 MBombach@perkinscoie.com
29 Abigail A. Gardner, Bar No. 334598
30 AGardner@perkinscoie.com
31 PERKINS COIE LLP
32 11452 El Camino Real, Ste 300
33 San Diego, California 92130-2080
34 Telephone: +1.858.720.5700
35 Facsimile: +1.858.720.5799

36 *Attorneys for Defendant Syntronic (Beijing) Technology R&D Center Co., LTD.*

37

38

39

40

41

42

43

1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Cadence Design
2 Systems, Inc. (“Cadence”), along with Defendants Syntronic AB, Syntronic Research and
3 Development USA Inc. (“Syntronic USA”), Syntronic (Beijing) Technology R&D Center Co. Ltd.
4 (“Syntronic Beijing”) (collectively “Defendants,” and together with Cadence, the “Parties”),
5 hereby jointly stipulate that this action be dismissed in its entirety *without prejudice*, with each
6 party to bear its own attorneys’ fees, costs, and expenses.

7

8

9

10 DATED: November 9, 2022

By: /s/ Guy Ruttenberg

Guy Ruttenberg
guy@ruttenbergiplaw.com
Steve Papazian
steve@ruttenbergiplaw.com
RUTTENBERG IP LAW, A PROFESSIONAL
CORPORATION
1801 Century Park East, Suite 1920
Los Angeles, CA 90067
Telephone: (310) 627-2270
Facsimile: (310) 627-2260
Attorneys for Plaintiff

11

12

13

14

15

16

17 DATED: November 9, 2022

By: /s/ Jason N. Haycock

Edward P. Sangster
edward.sangster@klgates.com
Jason N. Haycock,
jason.haycock@klgates.com
K&L Gates LLP
Four Embarcadero Center, Suite 1200
San Francisco, CA 94111
Telephone: +1 415 882 8200
Facsimile: +1 415 882 8220

23 Jeffrey C. Johnson
jeff.johnson@klgates.com
K&L Gates LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
Telephone: +1 206 623 7580
Facsimile: +1 206 623 7022

27 *Attorneys for Defendants Syntronic AB and Syntronic
Research and Development USA Inc.*

1
2 DATED: November 9, 2022

3 By: /s/ Chao "Wendy" Wang
4

5 Chao "Wendy" Wang
6 WWang@perkinscoie.com
7 Perkins Coie LLP
8 3150 Porter Drive
9 Palo Alto, CA 94304
10 Telephone: 650-838-4315
11 Facsimile: 650-838-4350

12 Matthew C. Bernstein
13 MBerstein@perkinscoie.com
14 Miguel J. Bombach
15 MBombach@perkinscoie.com
16 Perkins Coie LLP
17 11452 El Camino Real, Suite 300
18 San Diego, CA 92130-2080
19 Telephone: 858-720-5700

20 *Attorneys for Defendant Syntronic (Beijing)
21 Technology R&D Center Co., LTD.*